

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DAVID LEIBOWITZ, BENJAMIN  
LEIBOWITZ, JASON LEIBOWITZ, AARON  
LEIBOWITZ, and PINCHAS GOLDSHTEIN,

Plaintiffs,

v.

IFINEX INC., BFXNA INC., BFXWW INC.,  
TETHER HOLDINGS LIMITED, TETHER  
OPERATIONS LIMITED, TETHER  
LIMITED, TETHER INTERNATIONAL  
LIMITED, DIGFINEX INC., PHILIP G.  
POTTER, GIANCARLO DEVASINI,  
LUDOVICUS JAN VAN DER VELDE,  
REGINALD FOWLER, CRYPTO CAPITAL  
CORP., and GLOBAL TRADE SOLUTIONS  
AG,

Defendants.

Case No. 1:19-cv-09236 (KPF) (SN)

**DECLARATION OF CHRISTOPHER J. BEAL**  
**IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE**

I, CHRISTOPHER J. BEAL, being duly sworn, hereby depose and say as follows:

1. I am an attorney with the law firm of Dillion Miller & Ahuja, LLP, 5872 Owens Ave, Suite 200, Carlsbad, California 92008.
2. I submit this declaration in support of my motion for admission to practice *pro hac vice* as counsel for iFinex Inc., DigFinex Inc., BFXNA Inc., BFXWW Inc., Tether International Limited, Tether Operations Limited, and Tether Holdings Limited in the above-captioned action.
3. I am a member in good standing of the California Bar. My California Bar identification number is 216579 and a current certificate of good standing from the California Bar is attached to this Declaration as Exhibit A. I am also admitted to the United States District Courts for the Eastern,

Central, Northern and Southern Districts of California, and the United States Court of Appeals for the Ninth Circuit.

4. I have never been convicted of a felony.

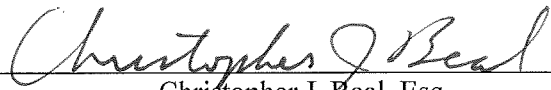
5. There are no pending disciplinary actions against me in any state or federal court.

6. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

7. Wherefore, upon the foregoing, I respectfully request that I be granted *pro hac vice* admission in this matter as counsel for iFinex Inc., DigFinex Inc., BFXNA Inc., BFXWW Inc., Tether International Limited, Tether Operations Limited, and Tether Holdings Limited.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 1, 2019  
Carlsbad, California

  
Christopher J. Beal, Esq.

# **EXHIBIT A**



The State Bar  
*of California*

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## CERTIFICATE OF STANDING

October 30, 2019

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, CHRISTOPHER JAMES BEAL, #216579 was admitted to the practice of law in this state by the Supreme Court of California on December 4, 2001 and has been since that date, and is at date hereof, an ACTIVE licensee of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "D/V", is positioned above the name Denise Velasco.

Denise Velasco  
Custodian of Records